

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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POLYSCIENCES, INC.,

Plaintiff/Counter-Defendant,

v.

JOSEPH T. MASRUD,

Defendant/Counter-Plaintiff.

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Civil Action No. 2:20-cv-03649-PBT

**DEFENDANT/ COUNTER-PLAINTIFF’S MOTION TO SEAL EXHIBIT**

Defendant/Counter-Plaintiff Masrud moves the Court to seal a portion of a filing concurrently being submitted herewith. This motion is unopposed. Without taking a position on the substance of the material to be sealed, the relief requested is consistent with the parties’ Protective Order (ECF No. 42).

The filing subject to this motion is Masrud’s Supplement to Defendant/Counter-Plaintiff’s Motion to Compel Plaintiff/Counter-Defendant to De-Designate its Attorneys’ Eyes Only Production and for Sanctions. (ECF No. 43). “Exhibit F” to the filing contains 15 sample documents inappropriately designated as Attorneys’ Eyes Only by Polysciences in this action. Masrud is separately submitting Exhibit F to the Court for its consideration on sealing. This exhibit supports the underlying Motion to De-Designate as it demonstrates the types of documents Polysciences has inappropriately designated AEO.

Masrud respectfully moves the Court to enter the accompanying proposed order to place under seal “Exhibit F” to ECF No. 43.

Dated: June 8, 2021

Respectfully submitted,

HOMANS PECK, LLC

/s/ Julianne L. Peck

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*Attorney for Defendant*

*Joseph T. Masrud*

**CERTIFICATE OF SERVICE**

I, Julianne Peck, hereby certify that the foregoing Motion to Seal Exhibit was filed using the Court's electronic filing system on the 8th day of June 2021 and served upon all counsel of record via ECF notification.

/s/ Julianne Peck  
JULIANNE PECK